



May 26, 2020

Dr. Jennifer Tucker  
Deputy Administrator  
U.S. Department of Agriculture, Agricultural Marketing Service  
National Organic Program  
1400 Independence Avenue, SW  
Washington, DC 20250

Re: AMS-NOP-20-0037; NOP-20-03; RIN: 0581-AD75; "National Organic Program:  
Organic Livestock and Poultry Practices Economic Analysis Report"; Published in Vol. 85,  
No. 79, Thursday, April 23, 2020

Dear Dr. Tucker:

On behalf of the nearly 200,000 family farmer, rancher and rural members of National Farmers Union (NFU), I am writing regarding the Economic Analysis Report for the Organic Livestock and Poultry Practices (OLPP) Rule. NFU is a general farm organization whose members are involved in all forms of production, including organic agriculture.

NFU continues to stand in strong support of the OLPP Rule, which strengthens the animal welfare standards for organic livestock production. NFU's grassroots, member-driven policy states that we support "Implementing and enforcing the organic livestock and poultry [practices] standards," and that such standards should be "uniform and account for feeding and animal health care and welfare practices for continuous and transitional organic management."<sup>1</sup> The decision to withdraw the OLPP Final Rule in January 2017 was ill advised, and the Rule should be reinstated without further delay.

Family farmers and ranchers work hard, and invest heavily, in maintaining the integrity of the organic seal. OLPP would create a level playing field for all organic livestock and poultry producers, which would honor that investment. Additionally, USDA must do its part to create rules that are rigorous and consistent in order to ensure that consumers can trust the seal. OLPP in particular is critically important to ensuring consumer confidence in the organic seal regarding animal welfare.

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<sup>1</sup> National Farmers Union, *Policy of the National Farmers Union* (March 2020).

It is disappointing that OLPP is not in effect today, and that more than three years after the Rule could have gone into effect, USDA is seeking comment on a new Economic Analysis Report, in reference to the Regulatory Impact Analysis (RIA) for the OLPP Final Rule and the rule withdrawal. Regarding USDA's cost-benefit analysis, NFU is concerned that USDA is underestimating the benefits of OLPP. Most importantly, the analysis does not give enough weight to the consumer trust benefits of a label meeting a higher, more robust, and uniform standard.

If you have any questions or would like to further discuss NFU's position, please contact Aaron Shier, NFU Senior Government Relations Representative, via e-mail at [ashier@nfudc.org](mailto:ashier@nfudc.org) or by phone at 202-554-1600.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Larew". The signature is fluid and cursive, with the first name "Rob" and last name "Larew" clearly distinguishable.

Rob Larew  
President